

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

FEB 27 2020

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
LARRY E. DEUTSCH,)
)
Defendant.)

4:20CR142 JAR/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:
 - (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
 - (b) "sexually explicit conduct" to mean actual or simulated
 - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the anus, genitals, or pubic area of any person
- (18 U.S.C. § 2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about October 1, 2019, and on or about February 19, 2020, in the Eastern District of Missouri, and elsewhere,

LARRY E. DEUTSCH

the defendant herein, did knowingly receive image files and video files of child pornography using any means and facility of interstate and foreign commerce, to wit the defendant knowingly received image files and video files of child pornography via the internet, to include but not limited to the following:

- a. an image file depicting a minor exhibiting her genitals in which the minor's genitals are the focus of the image, and

b. a video file depicting a minor masturbating,
in violation of 18 U.S.C. § 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about October 1, 2019, and on or about February 19, 2020, in the Eastern District of Missouri, and elsewhere,

LARRY E. DEUTSCH,

the defendant herein, did knowingly employ, use, persuade, induce, entice and coerce “AL,” who was a minor, to engage in sexually explicit conduct, specifically, a lascivious display of her genitals and masturbation, for the purpose of producing visual depictions of such conduct, and such depictions were transmitted using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce,
in violation of Title 18, United States Code, Section 2251(a).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about October 1, 2019, and on or about February 19, 2020, in the Eastern District of Missouri, and elsewhere,

LARRY E. DEUTSCH,

the defendant herein, did use any facility or means of interstate or foreign commerce, to knowingly persuade, induce, entice and coerce A.L., a minor under the age of eighteen years, to engage in sexual activity for which any person can be charged with a criminal offense, to wit the production, distribution, receipt and possession of child pornography, in violation of Title 18, United States Code, Section 2422(b).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

JILLIAN S. ANDERSON, #53918MO
Assistant United States Attorney